

Exhibit C

Exhibit C

'864 Patent, claim 1

Claim Element	Allegations in the Complaint	Alleged Actors in the Complaint
1. An apparatus, comprising:	<p><u>Paragraph 81-83 of the Complaint</u></p> <p>81. The Accused Instrumentalities comprise an apparatus comprising a memory device, a receiver, a processor, and a transmitter. The infringing apparatus comprises servers, hardware, software, and a collection of related and/or linked web pages and mobile applications for providing recruitment information and services to individuals (including individuals, independent contractors, temporary workers, and/or freelancers) in the United States. On information and belief, the Accused Instrumentalities comprise an apparatus with multiple interconnected infrastructures, including but not limited to multiple data centers, including Amazon Web Services (“AWS”) data centers located across the United States. Further on information and belief, Grubhub¹ employs multiple redundant data centers to withstand localized outages. <i>See above.</i></p> <p>82. On information and belief, the infringing Grubhub apparatus comprises Apache Cassandra as a primary data store. <i>See above.</i></p> <p>83. Upon information and belief, the Grubhub Accused Instrumentalities comprises data center housing memory devices, processing devices, receivers, and transmitters. On information and belief, such data centers are in Illinois, Texas, and Utah. <i>See above.</i></p>	Grubhub

¹ Grubhub does not capitalize the “H” in its name. When quoting Plaintiff’s allegations in these charts and the accompanying Motion to Dismiss, Defendant has corrected that spelling error.

<p>a memory device or a database, wherein the memory device or the database stores work schedule information or scheduling information of or for a plurality of individuals, independent contractors, temporary workers, or freelancers</p>	<p><u>Paragraph 84-85 of the Complaint</u></p> <p>84. The Grubhub Accused Instrumentalities comprise a memory device or database, which stores at least work schedule information and/or scheduling information for individual drivers in the Grubhub network, each of whom are, on information and belief, employed by Grubhub as Independent Contractors. <i>See</i> above.</p> <p>85. The Grubhub Accused Instrumentalities store work schedule information for each such driver (independent contractor) by virtue of the driver's "Block Scheduling" selections on the Grubhub Driver App or, in the alternative, by virtue of the driver notifying Grubhub of his/her availability for engagement on an open assignment. Available Blocks are open on a first-come, first-served basis for drivers, although certain drivers with higher ranking will receive priority. Drivers who have formally signed up for a given block of time are given assignment priority for deliveries during the timeframe over otherwise available drivers. <i>See</i> above.</p>	<p>Grubhub</p>
<p>a receiver, wherein the receiver receives a first request,</p>	<p><u>Paragraph 86 of the Complaint</u></p> <p>86. The Grubhub Accused Instrumentalities comprise a receiver for receiving a first request from a communication device associated with a hiring entity (e.g., the user of the Grubhub Mobile App for Consumers and/or the user of the Grubhub web page at grubhub.com). On information and belief, when a user seeks to place an order using the Grubhub apparatus, a first request is generated to obtain the work schedule information for the known available independent contractors in order to generate an Estimated Time for Delivery. If acceptable, the user has the option of placing the order and completing the transaction. <i>See</i> above.</p>	<p>User (Grubhub mobile app and/or use of the Grubhub web page at grubhub.com)</p>
<p>wherein the first request contains information regarding a request to obtain work schedule information or</p>	<p><u>Paragraph 86 of the Complaint</u></p> <p>86. The Grubhub Accused Instrumentalities comprise a receiver for receiving a first request from a communication device associated with a hiring entity (e.g., the user of the Grubhub Mobile App for Consumers and/or the user of the</p>	<p>User (Grubhub mobile app and/or use of the Grubhub web page at grubhub.com)</p>

scheduling information of or for an individual, an independent contractor, a temporary worker, or a freelancer, from among the plurality of individuals, independent contractors, temporary workers, or freelancers,	Grubhub web page at grubhub.com). On information and belief, when a user seeks to place an order using the Grubhub apparatus, a first request is generated to obtain the work schedule information for the known available independent contractors in order to generate an Estimated Time for Delivery. If acceptable, the user has the option of placing the order and completing the transaction. <i>See</i> above.	
wherein the first request is received from a first communication device associated with an employer or a hiring entity ;	<u>Paragraph 86 of the Complaint</u> 86. The Grubhub Accused Instrumentalities comprise a receiver for receiving a first request from a communication device associated with a hiring entity (e.g., the user of the Grubhub Mobile App for Consumers and/or the user of the Grubhub web page at grubhub.com). On information and belief, when a user seeks to place an order using the Grubhub apparatus, a first request is generated to obtain the work schedule information for the known available independent contractors in order to generate an Estimated Time for Delivery. If acceptable, the user has the option of placing the order and completing the transaction. <i>See</i> above.	User (Grubhub mobile app and/or use of the Grubhub web page at grubhub.com)
a processor , wherein the processor is associated with a website,	<u>Paragraph 81 of the Complaint</u> 81. The Accused Instrumentalities comprise an apparatus comprising a memory device, a receiver, a processor , and a transmitter. The infringing apparatus comprises servers, hardware, software, and a collection of related and/or linked web pages and mobile applications for providing recruitment information and services to individuals (including individuals, independent contractors, temporary workers, and/or freelancers) in the United States. On information and belief, the Accused Instrumentalities comprise an apparatus with multiple interconnected infrastructures, including but not limited to multiple data centers, including Amazon Web Services (“AWS”) data centers	Grubhub

	located across the United States. Further on information and belief, Grubhub employs multiple redundant data centers to withstand localized outages. <i>See</i> above.	
and further wherein the processor is specially programmed to process or to provide job search information, recruitment information, or recruitment-related information,		None
wherein the processor processes information contained in the first request,		None
wherein the processor or the apparatus generates a first message in response to the first request,		None
and wherein the first message contains the work schedule information or the scheduling information of or for the individual,		None

the independent contractor, the temporary worker, or the freelancer; and		
a transmitter,	<p><u>Paragraph 81 of the Complaint</u></p> <p>81. The Accused Instrumentalities comprise an apparatus comprising a memory device, a receiver, a processor, and a transmitter. The infringing apparatus comprises servers, hardware, software, and a collection of related and/or linked web pages and mobile applications for providing recruitment information and services to individuals (including individuals, independent contractors, temporary workers, and/or freelancers) in the United States. On information and belief, the Accused Instrumentalities comprise an apparatus with multiple interconnected infrastructures, including but not limited to multiple data centers, including Amazon Web Services (“AWS”) data centers located across the United States. Further on information and belief, Grubhub employs multiple redundant data centers to withstand localized outages. <i>See</i> above.</p>	Grubhub
wherein the transmitter transmits the first message to the first communication device on, over, or via, the Internet or the World Wide Web,		None
wherein the apparatus receives a second request,		None
wherein the second request contains	<u>Paragraph 87 of the Complaint</u>	User (Grubhub mobile app and/or use of the

information for reserving, engaging , or requesting, the services of the individual, the independent contractor , the temporary worker, or the freelancer,	87. On information and belief, when a user completes an order using the Grubhub Accused Instrumentalities, the order comprises a second request to engage and obtain the Grubhub Independent Contractor in the vicinity, and to thereafter receive delivery/status information. On information and belief, the Independent Contractors are notified via “push notification” when a new order is ready for delivery. Drivers are notified of available orders based on their proximity. If the initial driver does not timely respond by accepting the offer for delivery, it is passed to the next available driver for consideration. The second request is confirmed, and the user is then given the options to “Track My Order” and real-time mapping features, as well as by the “ETA” and order status indications on the Grubhub Consumer App. <i>See</i> above	Grubhub web page at grubhub.com)
wherein the apparatus processes the information contained in the second request and generates a second message containing information regarding the second request, and		None
further wherein the apparatus transmits the second message to a second communication device,		None
wherein the second communication device is associated with the individual, the independent contractor,		None

the temporary worker, or the freelancer.		
---	--	--